

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
GAINESVILLE DIVISION**

JANESLY LAFORTUNE,

Plaintiff,

v.

LANIER HOME RESTORATION
GROUP, CORP. and LESLIE
CORELY,

Defendants.

CIVIL ACTION FILE NO:
2:24-cv-00159-SCJ

JURY TRIAL DEMANDED

**ANSWER TO DEFENDANT LANIER HOME RESTORATION GROUP
CORP.'S COUNTERCLAIMS**

Counterclaim Defendant Janesly LaFortune files his answer to Counterclaim Plaintiff Lanier Home Restoration Group Corp. counterclaims as follows:

FIRST DEFENSE

Counterclaim Plaintiff's counterclaims fail to state claims upon which relief can be granted.

SECOND DEFENSE

Counterclaim Plaintiff's counterclaims are barred by the doctrines of waiver and estoppel.

THIRD DEFENSE

Counterclaim Plaintiff's counterclaims are barred by the doctrine of accord and satisfaction.

FOURTH DEFENSE

Counterclaim Plaintiff's counterclaims are barred by a failure of consideration.

FIFTH DEFENSE

Counterclaim Plaintiff's counterclaims are barred by illegality.

SIXTH DEFENSE

Counterclaim Plaintiff's counterclaim for unjust enrichment is barred by the doctrine of laches.

SEVENTH DEFENSE

Counterclaim Plaintiff's counterclaims for unjust enrichment and conversion are barred by Counterclaim Plaintiff's unclean hands.

EIGHTH DEFENSE

Counterclaim Plaintiff's counterclaims are barred in whole or in part by Georgia's employment at will statute.

NINTH DEFENSE

Counterclaim Plaintiff's counterclaims are barred in whole or in part by Georgia public policy.

ELEVENTH DEFENSE

Counterclaim Defendant responds to the numbered paragraphs of Counterclaim Plaintiffs' Counterclaims as follows:

c1.

Counterclaim Defendant it without sufficient knowledge to admit or deny the allegations contained with Paragraph c1, and therefore denied.

c2.

Counterclaim Defendant admits the allegations as stated within Paragraph c2.

c3.

Counterclaim Defendant admits he was a Project Manager, but denies the remaining allegations as stated in Paragraph c3.

c4.

Counterclaim Defendant denies the allegations as stated within Paragraph c4.

c5.

Counterclaim Defendant denies the allegations as stated within Paragraph c5.

c6.

Counterclaim Defendant denies the allegations as stated within Paragraph c6.

c7.

Counterclaim Defendant denies the allegations as stated within Paragraph c7.

c8.

Counterclaim Defendant denies the allegations as stated within paragraph c8.

c9.

Counterclaim Defendant denies the allegations contained within Paragraph
c9.

c10.

Counterclaim Defendant denies the allegations contained within Paragraph
c10.

c11.

Counterclaim Defendant denies the allegations contained within Paragraph
c11.

c12.

Counterclaim Defendant admits he was required to engage subcontractors
from Counterclaim Plaintiff's approved list. Counterclaim Defendant denies the
remaining allegations as stated within Paragraph c12.

c13.

Counterclaim Defendant denies the allegations as stated in Paragraph c13.

c14.

Counterclaim Defendant denies the allegations as stated in Paragraph c14.

c15.

Counterclaim Defendant denies the allegations as stated in Paragraph c15.

c16.

Counterclaim Defendant denies the allegations as stated in Paragraph c16.

c17.

Counterclaim Defendant denies the allegations as stated in Paragraph c17.

c18.

Counterclaim Defendant is without sufficient knowledge to admit or deny the allegations contained in Paragraph c18, therefore denied.

c19.

Counterclaim Defendant is without sufficient knowledge to admit or deny the allegations contained in Paragraph c19, therefore denied.

c20.

Counterclaim Defendant Plaintiff denies the allegations as stated within paragraph c20.

c21.

Counterclaim Defendant admits the allegations as stated within paragraph c21.

c22.

Counterclaim Defendant admits the allegations as stated within paragraph c22.

c23.

Counterclaim Defendant is without sufficient knowledge to admit or deny the allegations as stated within paragraph c23, therefore denied.

COUNTERCLAIM I: BREACH OF FIDUCIARY DUTY

c24.

The allegations of paragraph c24 do not require a response. Nonetheless, to the extent this paragraph is deemed to require a response, Counterclaim Defendant reincorporates his responses to paragraphs c1 – c24 above.

c25.

Counterclaim Defendant denies the allegations as stated within paragraph c25.

c26.

Counterclaim Defendant denies the allegations as stated within paragraph c26.

c27.

Counterclaim Defendant denies the allegations as stated within paragraph c27.

c28.

Counterclaim Defendant denies the allegations as stated within paragraph c28.

COUNTERCLAIM II: UNJUST ENRICHMENT

c37.

The allegations of paragraph c37 do not require a response. Nonetheless, to the extent this paragraph is deemed to require a response, Counterclaim Defendant reincorporates his responses to paragraphs c1 – c24 above.

c38.

Counterclaim Defendant denies the allegations as stated within paragraph c38.

C40.

Counterclaim Defendant denies the allegations as stated within paragraph c40.

C41.

Counterclaim Defendant denies the allegations as stated within paragraph c41.

COUNTERCLAIM III: CONVERSION

c42.

The allegations of paragraph c42 do not require a response. Nonetheless, to the extent this paragraph is deemed to require a response, Counterclaim Defendant reincorporates his responses to paragraphs c1 – c24 above.

c43.

Counterclaim Defendant denies the allegations contained in paragraph c43.

c44.

Counterclaim Defendant denies the allegations contained in paragraph c44.

c45.

Counterclaim Defendant denies the allegations contained in paragraph c45.

PRAYER FOR RELIEF

Counterclaim Defendant denies that Counterclaims Plaintiffs are entitled to any of the relief requested.

Counterclaim Defendant denies any and all remaining allegations of Counterclaim Plaintiffs' Counterclaims not specifically admitted herein.

WHEREFORE Counterclaim Defendant prays that Counterclaim Plaintiffs' counterclaims be dismissed in their entirety and that he be awarded his costs.

Respectfully submitted this 2nd day of July, 2025.

/s/ William S. Cleveland
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Counsel for Plaintiff

CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1D, counsel hereby certifies that the foregoing has been prepared using Times New Roman 14-point font, as approved by Local Rule 5.1C.

CERTIFICATE OF SERVICE

I further certify that on this day, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will automatically send notice of such filing to all attorneys of record.

Respectfully submitted this 2nd day of July 2025.

/s/ William S. Cleveland
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